

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL NO. 16-2738 (MAS) (RLS)**

***THIS DOCUMENT RELATES TO ALL CASES***

**CERTIFICATION OF P. LEIGH O'DELL, ESQ.**

P. Leigh O'Dell, ESQ., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs. I submit this Certification based on personal knowledge in support of the Motion of the Plaintiffs' Steering Committee to Exclude the Opinions of Drs. Michael Finan, Cheryl Saenz and Kevin Holcomb.
2. Attached hereto as Exhibit 1 is a true and correct copy of the Amended Expert Report of Cheryl C. Saenz, MD (General), dated May 21, 2024.
3. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Report of Kevin Holcomb, MD, FACOG (Gallardo), dated May 28, 2024.
4. Attached hereto as Exhibit 3 is a true and correct copy of the Expert Report of Michael A. Finan, MD (Bondurant), dated May 28, 2024.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Expert Report of Cheryl C. Saenz, MD (Converse), dated May 28, 2024.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Expert Report of Cheryl C. Saenz, MD (Judkins), dated May 28, 2024.

7. Attached hereto as Exhibit 6 is a true and correct copy of the Expert Report of Cheryl C. Saenz, MD (Newsome), dated May 28, 2024.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Expert Report of Cheryl C. Saenz, MD (Rausa), dated May 28, 2024.

9. Attached hereto as Exhibit 8 is a true and correct copy of the transcript of the Deposition of Michael Finan, MD (MDL-Bondurant), dated June 26, 2024.

10. Attached hereto as Exhibit 9 is a true and correct copy of the Third Amended Expert Report of Judith Wolf, MD (General), dated May 28, 2024.

11. Attached hereto as Exhibit 10 is a true and correct copy of the transcript of the Deposition of Kevin Holcomb, MD (Gallardo), dated June 7, 2024.

12. Attached hereto as Exhibit 11 is a true and correct copy of the transcript of the Deposition of Michael Finan, MD (MCL-Carl), dated May 10, 2024.

13. Attached hereto as Exhibit 12 is a true and correct copy of the transcript of the Deposition of Cheryl Saenz, MD (MDL), dated June 19, 2024.

14. Attached hereto as Exhibit 13 is a true and correct copy of the transcript of the Deposition of Cheryl Saenz, MD (MDL), dated June 20, 2024.

15. Attached hereto as Exhibit 14 is a true and correct copy of the Order in Valadez v. Johnson & Johnson, et al. regarding Hearing on Motion to Compel, dated May 4, 2023.

16. Attached hereto as Exhibit 15 is a true and correct copy of the Second Amended Expert Report of Shawn Levy, MD (General), dated May 28, 2024.

17. Attached hereto as Exhibit 16 is a true and correct copy of the Third Amended Expert Report of Daniel L. Clarke-Pearson, MD (General), dated May 28, 2024.

18. Attached hereto as Exhibit 17 is a true and correct copy of the Press Release written by Owen Dyer entitled “Johnson & Johnson Recalls its Baby Powder after FDA Finds Asbestos in Sample” published in BMJ on October 21, 2019.

19. Attached hereto as Exhibit 18 is a true and correct copy of the Analysis of Johnson & Johnson’s Historical Product Containers and Imerys’ Historical Railroad Car Samples from the 1960’s to the Early 2000’s for Amphibole Asbestos, 2<sup>nd</sup> Supplemental Report by William E. Longo and Mark Rigler, dated February 1, 2019.

20. Attached hereto as Exhibit 19 is a true and correct copy of the Analysis of Non-Historical J&J’s Talcum Powder Consumer Product Containers and J&J Chinese Historical Talc Retain Samples, 3<sup>rd</sup> Supplemental Report by William E. Longo, dated November 17, 2023.

21. Attached hereto as Exhibit 20 is a true and correct copy of an Excerpt of the International Agency for Research on Cancer (IARC), Volume 100C, *Arsenic, Metals, Fibres and Dusts* (2012).

22. Attached hereto as Exhibit 21 is a true and correct copy of the transcript of the Deposition of Kevin Holcomb, MD (MDL), dated March 27, 2019.

23. Attached hereto as Exhibit 22 is a true and correct copy of the transcript of the Deposition of Cheryl Saenz, MD (MDL), dated March 13, 2019.

24. Attached hereto as Exhibit 23 is a true and correct copy of the Expert Report of Cheryl Christine Saenz, MD (MDL General), dated February 25, 2019.

25. Attached hereto as Exhibit 24 is a true and correct copy of an Excerpt of the Reference Manual on Scientific Evidence, Third Edition (2011).

26. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: July 23, 2024

/s/P. Leigh O'Dell  
P. LEIGH O'DELL